

DECISION MEMO
Ishawooa Trail Reconstruction

USDA FOREST SERVICE
Shoshone National Forest
North Zone/Wapiti Ranger District
Park County, Wyoming

Project Identification: N0120
Ishawooa Trail Reconstruction- T49N, R106W-R108W, Various Sections

Decision

I have reviewed the environmental analysis and my decision is to implement the proposed action for the Ishawooa Trail Reconstruction. The proposed action falls under Category 1, in Section 31.2 of the Forest Service Handbook 1909.15 – Environmental Policy and Procedures Handbook – Construction and Reconstruction of Trails.

The existing conditions are a risk to trail users, horses and pack animals. Without the trail reconstruction work, existing excessively steep grades and safety and erosion concerns from the trail location would continue. The proposed action would correct trail deficiencies, reduce hazards to improve safety, and reduce resource impacts to soil and water. The Ishawooa Trail #768 project consists of

- Trail reconstruction (approximately three miles) on the existing trail alignment
- The actual relocation of the trail (0.75 miles) to a more suitable location and grade by constructing switchbacks near Ishawooa Pass
- Heavy maintenance as needed on along the 17-mile trail.

The decision rationale for implementing the proposed action is based on the following issues and how the decision would address the issue:

Recreation/Wilderness Facilities and Experiences

How to implement the proposal with the least impact to the wilderness resource and be the least apparent to the user?

Health and Safety

How to provide for the removal of hazards and provide a safe experience?

Resource Management

How to maintain trails/bridges used by horses and pack stock for resource protection (soil, water, wilderness)?

Decision Rationale

The decision and actions implemented need to be the most expeditious, cost-efficient methods available to address concerns in terms of health and safety and wilderness management. Engineering design will be used to design trail grade and switchbacks for the portion of trail being relocated.

Project implementation will reduce resource impacts caused by ongoing erosion and trail widening. In addition, the actions will make the trail safer and still meet wilderness experience criteria for a trail that provides a high degree of challenge, self-reliance, and risk. It is not intended or anticipated that visitor use numbers, campsite impacts, or visitor encounters will increase in any measurable degree along the trail corridor because of this action.

Constraints such as budget and personnel, project funding, changing priorities, impacts of fire season, etc. affect the scheduling and completion of the project. Because of the distance to the job and the short

operating season (due to the climate and elevation of the site), these factors may cause the trail work to continue through 2007.

Proposed Action

The Proposed Action for Ishawooa Trail project involves trail reconstruction of three miles on the existing alignment, relocation of 0.75 miles of trail to improve the grade and reduce risks, and heavy maintenance along the entire 17 miles of trail over a period of up to four years. The Ishawooa Trail is a mainline trail in the Washakie Wilderness and is used by hikers, horses, and pack stock as a primary access to the Thorofare region of the Teton Wilderness and Yellowstone National Park. It is a key component of the wilderness transportation system.

Two alternatives were considered, including: 1) no action, and 2) the proposed action, to perform needed maintenance, reconstruction, and relocation on the Ishawooa Trail.

I have chosen to implement the following elements of the Proposed Action to address the purpose and need for the project:

Summary of Proposed Action for the Ishawooa Trail Reconstruction

- Perform heavy maintenance on 17 miles of the trail as needed. Reconstruct approximately three miles of trail. Relocate 0.75 miles of mainline trail in two segments ranging from 600 feet to 0.5 miles (some rock blasting may be necessary to relocate the trail). The relocation of the trail will be done on the upper end (west) of the trail where it ascends to Ishawooa Pass. The trail will be relocated to a better grade through the construction of switchbacks.
- Abandon 0.5 miles of the existing trail (in two different segments) resulting from trail relocation. These portions of abandoned trail will be rehabilitated and naturalized by blocking off to prevent future use and will be allowed to return to a natural state.
- Reconstruct approximately 120 feet of puncheon bridge to replace existing puncheon bridges in need of replacement.
- Install 55 to 75 water bars and 200 to 250 drain dips; most of the drainage features will be constructed on the relocated, new portions of the trail or as part of heavy maintenance on the trail.
- No tree removal will be needed; minor brush removal in the trail corridor will be completed in trail locations that are relocated.
- Camps needed for the trail crew include a site in Sec. 5, T49N, R106W and Sec. 7, T49N, R107W. No stock would be kept at these two camps.
- To ensure public safety during the reconstruction work, the trail may be closed intermittently to all public use as needed. The trailhead will be posted with reconstruction schedules and updates. Signs will be placed along the trail in both directions immediately before entering the active work areas. As needed, individuals will be posted along the trail to stop traffic until it is safe to let people proceed.

I have chosen these specifics for project design and implementation to minimize any environmental effects or for site enhancement. They include:

- Construct bridges to the standard necessary to accommodate the specified class of user.
- A cultural resource survey will be completed and no change to the historic nature of the area will result.
- The trail reconstruction crew, to minimize the impacts to existing campsites and new use areas, will use Leave No Trace camping techniques.
- The use of stock by crews on the Ishawooa Trail will be limited as much as possible to minimize the formation of new impacted sites.
- Processed feed meeting weed-free certification will be used for horse/pack stock.
- As needed, spotters (individuals) will be posted along the trail to stop traffic until it is safe to let people proceed during critical times during construction of the bridge, when the bridge is not passable, and periods of high use on the trail.

- Bear food storage orders and other techniques for camping in bear country will be followed.
- All employees, contractors, and subcontractors involved in the project will comply with the following conditions in the conduct of all activities in order to prevent human/bear conflicts and to minimize injuries if involved in an encounter with a bear.
 - All persons involved will complete human safety awareness training relative to human/bear conflict prevention/avoidance procedures, encounter procedures, and the use of bear spray.
 - Bear-resistant storage facilities will be available, and all persons will adhere to the proper use

Purpose of and Need for Action

The need for the project is tiered to goals of the Shoshone National Forest Land and Resource Management Plan (Forest Plan) as amended, primarily:

Goal

Manage designated wilderness under the Wilderness Act of 1964 to protect and perpetuate essentially natural biophysical conditions and to provide for wilderness recreation opportunities.

Applicable General Direction and Standards and Guidelines

The following shows applicable direction from the Forest Plan. Additional direction is found in the Washakie Wilderness Plan.

- Construct or reconstruct trails only when needed to meet objectives of the wilderness transportation system.
- Construct bridges to only the standard necessary to accommodate the specified class of user. Construct bridges only where no safe opportunity exists to cross a stream or gorge during periods of normal stream flow.
- A safety hazard is a physical condition of a trail, which may cause injury, is unusual or unexpected, and not readily identifiable by the trail user—it is not a condition that is easily identifiable and normally encountered for the type or location of the trail involved. Examples are found on page III-197 of the Plan.
- Use corduroy and/or puncheon treads across bogs where no safe and feasible bypass opportunity exists.

Purpose

The overall intent of the project is to maintain a mainline trail on the wilderness transportation system and conform to the plan direction to: “Construct or reconstruct trails only when needed to meet objectives of the wilderness transportation system.” Further rationale for the project is to improve the health and safety concerns currently on-site, especially to reduce the risk associated with the excessively steep trail near Ishawooa Pass.

The purpose and need of the Ishawooa Creek Trail #768 reconstruction and relocation project is to maintain the wilderness transportation system and meet these project goals: 1) reduce hazards and improve safety conditions for wilderness trail users on foot, horse and/or pack stock, 2) improve resource conditions by reducing sedimentation or relocating steep sections of trails, or where braiding or other impacts are occurring, 3) improve trail design or location to maintain the effectiveness of the short- and long-term maintenance on this trail, 4) improve the visitor’s experience on the trail and provide primitive recreation opportunities.

A safety hazard is a physical condition of a trail, which may cause injury, is unusual or unexpected, and not readily identifiable by the trail user. This is the case for portions of the trail where a safety hazard exists due to the excessively steep or deteriorated condition of the existing trail. The purpose is to bring the trail up to standard through heavy maintenance, reconstruction, or realignment, especially areas that pose a safety hazard and risk of injury or death, or resource impacts. No other actions or alternatives were identified that would meet the need. If no action were taken, a satisfactory solution to meet the need for a functional wilderness transportation system would not be met.

Reasons for Categorically Excluding the Proposed Action

The proposed action falls under Category 1, in Section 32 of the Forest Service Handbook 1909.15 – Environmental Policy and Procedures Handbook – Construction and Reconstruction of Trails. Based on internal and external scoping, field reviews, specialist's input and past experience, and project design measures, the effects of implementing this action will be of limited context and intensity and will result in little or no environmental effects to either the physical or biological components of the environment.

Forest Plan Direction/Findings Required by Other Laws

This proposal for trail reconstruction is consistent with laws (Wilderness Act), regulations, and policy, as well as standards and guidelines in the Shoshone Forest Plan, as amended. The management area is 8C, where the primary management direction is to provide for semi-primitive wilderness opportunities. This decision is in accordance with the Washakie Wilderness Plan and other applicable federal regulations and laws.

This decision was coordinated with the Forest archaeologist and the Wyoming State Historic Preservation Office (SHPO). In a letter from the SHPO (dated 5/24/02) to Region 2 of the Forest Service, if a cultural resource survey is completed and no sites are found then it is not necessary to wait for a concurrence letter from SHPO before the project can proceed. No sites were found in the project area; therefore, concurrence can be assumed for the purposes of Section 106 compliance, and the project can proceed.

Scoping and Public Involvement

This decision is being distributed to those who responded to the scoping letter or expressed an interest. The scoping statement was mailed April 26, 2001 for a 30-day public comment period. At this time, it was posted on the Forest's web page and has remained on the web for public viewing for two years. The scoping was mailed to county commissioners, state agencies, Indian Tribes, conservation and environmental groups, radio stations, newspapers, and private individuals. The Wyoming Game and Fish Department identified no terrestrial or aquatic concerns and the State Historic Preservation Officer indicated, "Provided the USFS follows the procedures required by federal law and established in the regulations, we have no objections to the project."

These are the concerns that were identified from the external public scoping process and internally are the issues that were identified to help focus the decision-making process are stated on page 1.

Finding of No Extraordinary Circumstances

Under Forest Service Handbook definition, extraordinary circumstances exist only when conditions associated with the proposed action are identified "as potentially having effects which may significantly affect the environment." There are no extraordinary circumstances related to the proposed action if the officer making the decision does not determine that conditions associated with the proposed action potentially have effects which may significantly affect the environment. Scoping was conducted to identify any conditions associated with a normally excluded action as potentially having effects that may significantly affect the environment.

Extraordinary circumstances include, but are not limited to, steep slopes or highly erosive soils, threatened and endangered species or their critical habitat, wetlands and flood plains, wetlands, or municipal watersheds, inventoried roadless areas, Congressionally designated areas (such as wilderness, wilderness study areas, or National Recreation Areas), Research Natural Areas, or Native American religious or cultural sites, archaeological sites, or historic properties or areas. These are summarized in the table below to describe the situation for extraordinary circumstances and the effects the project would or would not have.

Extraordinary Circumstances	Conditions that may lead to a finding of extraordinary circumstances (Yes or No). If needed, the discussions of <i>conditions</i> that may lead to a finding of extraordinary circumstances are discussed in greater detail following the table.
a. Steep slopes or highly erosive soils	Yes. Steep slopes or highly erosive soils are present due to the mountain setting and Absaroka volcanics soil; however, <i>conditions</i> that may lead to a finding of extraordinary circumstances do not exist since the proposed action would relocate sections of the trail with erosion problems to a better location. Resource values will be enhanced and protected because of the project, by correcting erosion problems occurring on the existing trail. The new trail segments will be designed with erosion control structures (dips, cross drains) to reduce the erosion potential.
b. Threatened and endangered species or their critical habitat (Attach concurrence from fisheries/wildlife biologist and botanist as needed)	Yes, discussed below. A Biological Assessment for Proposed and Listed Species and a Biological Evaluation for R-2 Sensitive Species was completed.
c. Flood plains, wetlands, or municipal watersheds	No. Flood plains, wetlands, or municipal watersheds are present; however, <i>conditions</i> that may lead to a finding of extraordinary circumstances do not exist. Engineers considered the 100-year flood level (226 cfs) in the bridge engineering design. Wetlands or municipal watersheds are not present.
d. Congressionally designated areas, such as wilderness, wilderness study areas, or National Recreation Areas.	Yes. This trail reconstruction and relocation work occurs in the Washakie Wilderness; this proposal is not expected to reduce values associated with Wilderness. Proposed work is not expected to cause any large increase in visitor use numbers or impacts. The intent of the project is to provide a safe experience with a more “untrammelled” character. The project complies with the Wilderness Act and the Washakie Wilderness Management Plan. Therefore, <i>conditions</i> that may lead to effects from the project on Congressionally designated areas and Wilderness areas do not exist.
e. Inventoried roadless areas.	No. None present; therefore, no effects from the project on inventoried roadless areas.
f. Research Natural Areas	No. None present; therefore, no effects from the project on Research Natural Areas.
g. Native American religious or cultural sites, archeological sites, or historic properties or areas.	No. None present as determined by the Forest Archaeologist.

Conditions that may lead to a finding of extraordinary circumstances are discussed in greater detail in the following:

Threatened and Endangered Species

I have concluded that the project would have no effect on any endangered or threatened species known or suspected to occur in the project influence zone; therefore, no conditions that may lead to a finding of extraordinary circumstances exist. This is based on the biological evaluation process followed by the North Zone Wildlife Biologist, who concluded: *“It is my determination that the proposed action will have “no effect” on any proposed or listed species known or suspected to occur in the Ishawooa Trail area. I have also concluded that this proposed action would have “no effect” on any Region 2 sensitive species known or suspected to occur in the Cut Coulee area, or on any Forest Plan management indicator*

species (MIS) that are known or suspected to occur in the Ishawooa area.” The wildlife documentation for the analysis/evaluation is located in the project file.

Summary

An evaluation of potential effects to extraordinary circumstances was completed. This analysis indicated that no extraordinary circumstances would be adversely affected. I have reviewed the proposal and determined that no significant effects would occur from its implementation. The effects of the actions, as determined through scoping, are not highly controversial and are similar to other actions that have been implemented in the area. There were no comments received in response to the scoping; the assumption is that general agreement and support for this project exists.

Trail reconstruction and hazard reduction to improve human health and safety on mainline trails are common and ordinary actions. The effects on the human environment are not highly uncertain or involve unique risks. The Forest Service has been maintaining and reconstructing trails for years with predictable results. The methods and techniques used for implementation are neither new nor experimental.

Current management in the area includes trail maintenance, monitoring of campsite impacts and social encounters, outfitter/guide administration, protecting wilderness values, fire management, and resource protection. Reasonable foreseeable actions in the trail corridor include a continuation of these ongoing management actions and replacement of the Cut Coulee Trail bridge in 2003. The action is not related to any actions that would result in significant cumulative impacts when viewed with ongoing and reasonably foreseeable actions. The project does not represent a decision in principle about future considerations and does not violate federal, state, or local laws or requirements imposed for protection of the environment. Implementation of this project does not necessitate the need for any future actions other than annual maintenance of the improvements, nor are any future actions dependent upon the implementation of this project. No significant effects on the physical, biological, economic, or social elements of the human environment were identified.

Implementation and Contacts

This decision can be implemented immediately and is not subject to appeal pursuant to 36 CFR 215.8 (a) (4). In order to ensure safety for employees and the public and protect infrastructure/facilities, this project will be implemented as soon as possible beginning the summer of 2003 and implemented over a period of four years.

For further information on this decision, contact Thad Barhaug or Thad Harper, Recreation/Wilderness, or Marty Sharp, NEPA Coordinator, 203A Yellowstone Ave., Cody, Wyoming 82414, or telephone 307-527-6921.

/s/ Dave Sisk

June 28, 2003

Dave Sisk
Acting District Ranger

Date

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